

2024-1492, 2024-1493

**United States Court of Appeals
for the Federal Circuit**

CPC PATENT TECHNOLOGIES PTY LTD.,

Appellant,

v.

ASSA ABLOY AB, ASSA ABLOY INC., HID GLOBAL CORP., ASSA ABLOY
GLOBAL SOLUTIONS, INC., MASTER LOCK COMPANY, LLC,

Appellee.

*Appeal from the United States Patent and Trademark Office,
Patent Trial and Appeal Board in Nos. IPR2022-01093 and
IPR2022-01094*

**UNOPPOSED MOTION OF APPELLANT FOR AN EXTENSION OF TIME
TO FILE REPLY BRIEF**

Pursuant to Federal Circuit Rules 26(b) and 31(a), Appellant CPC Patent Technologies Pty Ltd. (“CPC” or “Appellant”), moves for a 30-day extension of time to file its reply brief. Appellant’s reply brief is currently due on Wednesday, August 28, 2024. If the extension is granted, the 30-day extension of time will extend the due date to Friday, September 27, 2024. This is Appellant’s first request for an extension of time in this appeal. Counsel for Appellant has conferred with

counsel for Appellees ASSA ABLOY AB, ASSA ABLOY Inc., HID Global Corp., ASSA ABLOY Global Solutions, Inc. and Master Lock Company, LLC (collectively, “Appellees”), who has confirmed that Appellees do not oppose this motion for the requested extension of time for Appellant’s reply brief.

As set forth in the attached declaration of attorney Steven M. Coyle, Appellant’s motion is made in good faith and not for the purpose of delay. Counsel for Appellant will be engaged in other ongoing litigation matters and other previously scheduled obligations during the period overlapping with the time to prepare and file Appellant’s reply brief in this case. Appellant therefore respectfully submits that the proposed 30-day extension is both necessary and reasonable.

For the foregoing reasons, Appellant respectfully requests a 30-day extension of time within which to file its reply brief, to, and including, Friday, September 27, 2024.

Respectfully submitted,

Dated: August 14, 2024

By: /s/ Steven M. Coyle
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Appellee.

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IPR2022-01094*

**DECLARATION OF STEVEN M. COYLE IN SUPPORT OF APPELLANT'S
MOTION FOR AN EXTENSION OF TIME TO FILE RESPONSE BRIEF**

1. I, Steven M. Coyle, am a partner with Cantor Colburn LLP, and
counsel for Appellant CPC Patent Technologies Pty Ltd. (“CPC” or “Appellant”).

2. All the facts set forth in Appellant’s motion are, to the best of my
knowledge, true and correct.

3. This motion is made in good faith and not for the purpose of delay or
other procedural advantage.

4. The requested 30-day extension of time is needed because of personal and professional obligations during August and September, including obligations and deadlines in district court litigation, in proceedings before the United States Patent and Trademark Office, and previously-scheduled travel that limit the amount of time that can be spent on preparing Appellant's Reply Brief. The requested 30-day extension is needed to allow the attorneys working on this appeal to prepare the reply brief, and to allow sufficient time for Appellant to review and comment on the brief.

5. Appellant previously contacted counsel for Appellees ASSA ABLOY AB, ASSA ABLOY Inc., HID Global Corp., ASSA ABLOY Global Solutions, Inc. and Master Lock Company, LLC, who indicated that Appellees do not oppose the requested 30-day extension.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 14, 2024

By: /s/ Steven M. Coyle
Steven M. Coyle

FORM 9. Certificate of Interest

Form 9 (p. 1)
March 2023

**UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT**

CERTIFICATE OF INTEREST

Case Number 2024-1492; 2024-1493

Short Case Caption CPC Patent Technologies Pty Ltd. v. Assa Abloy AB et al

Filing Party/Entity CPC Patent Technologies Pty Ltd.

Instructions:

1. Complete each section of the form and select none or N/A if appropriate.
2. Please enter only one item per box; attach additional pages as needed, and check the box to indicate such pages are attached.
3. In answering Sections 2 and 3, be specific as to which represented entities the answers apply; lack of specificity may result in non-compliance.
4. Please do not duplicate entries within Section 5.
5. Counsel must file an amended Certificate of Interest within seven days after any information on this form changes. Fed. Cir. R. 47.4(c).

I certify the following information and any attached sheets are accurate and complete to the best of my knowledge.

Date: 08/14/2024

Signature: /s/ Steven M. Coyle

Name: Steven M. Coyle

FORM 9. Certificate of Interest

Form 9 (p. 2)
March 2023

1. Represented Entities. Fed. Cir. R. 47.4(a)(1).	2. Real Party in Interest. Fed. Cir. R. 47.4(a)(2).	3. Parent Corporations and Stockholders. Fed. Cir. R. 47.4(a)(3).
Provide the full names of all entities represented by undersigned counsel in this case.	Provide the full names of all real parties in interest for the entities. Do not list the real parties if they are the same as the entities. <input checked="" type="checkbox"/> None/Not Applicable	Provide the full names of all parent corporations for the entities and all publicly held companies that own 10% or more stock in the entities. <input type="checkbox"/> None/Not Applicable
CPC Patent Technologies Pty Ltd.		Charter Pacific Corporation Limited

☐ Additional pages attached

FORM 9. Certificate of Interest

Form 9 (p. 3)
March 2023

4. Legal Representatives. List all law firms, partners, and associates that (a) appeared for the entities in the originating court or agency or (b) are expected to appear in this court for the entities. Do not include those who have already entered an appearance in this court. Fed. Cir. R. 47.4(a)(4).

☒ None/Not Applicable ☐ Additional pages attached

5. Related Cases. Other than the originating case(s) for this case, are there related or prior cases that meet the criteria under Fed. Cir. R. 47.5(a)?

☒ Yes (file separate notice; see below) ☐ No ☐ N/A (amicus/movant)

If yes, concurrently file a separate Notice of Related Case Information that complies with Fed. Cir. R. 47.5(b). **Please do not duplicate information.** This separate Notice must only be filed with the first Certificate of Interest or, subsequently, if information changes during the pendency of the appeal. Fed. Cir. R. 47.5(b).

6. Organizational Victims and Bankruptcy Cases. Provide any information required under Fed. R. App. P. 26.1(b) (organizational victims in criminal cases) and 26.1(c) (bankruptcy case debtors and trustees). Fed. Cir. R. 47.4(a)(6).

☒ None/Not Applicable ☐ Additional pages attached

FORM 19. Certificate of Compliance with Type-Volume Limitations

Form 19
July 2020

**UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT**

CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMITATIONS

Case Number: 2024-1492; 2024-1493

Short Case Caption: CPC Patent Technologies Pty Ltd. v. Assa Abloy AB et al

Instructions: When computing a word, line, or page count, you may exclude any items listed as exempted under Fed. R. App. P. 5(c), Fed. R. App. P. 21(d), Fed. R. App. P. 27(d)(2), Fed. R. App. P. 32(f), or Fed. Cir. R. 32(b)(2).

The foregoing filing complies with the relevant type-volume limitation of the Federal Rules of Appellate Procedure and Federal Circuit Rules because it meets one of the following:

- ☒ the filing has been prepared using a proportionally-spaced typeface and includes 235 words.
- ☐ the filing has been prepared using a monospaced typeface and includes _____ lines of text.
- ☐ the filing contains _____ pages / _____ words / _____ lines of text, which does not exceed the maximum authorized by this court's order (ECF No. _____).

Date: 08/14/2024

Signature: /s/ Steven M. Coyle

Name: Steven M. Coyle